

RETURN DATE: OCTOBER 8, 2019

ESTATES OF JOANNA AND SETH  
WAKEMAN, BY THEODORE LADWIG,  
EXECUTOR

SUPERIOR COURT

V.

JUDICIAL DISTRICT OF  
NEW LONDON AT  
NEW LONDON

CSAA AFFINITY INSURANCE COMPANY  
D/B/A AAA INSURANCE COMPANY,  
LUCILLE J. KILEY, PERMITTEE OF  
CAPTAIN DANIEL PACKER INN A/K/A  
CAPTAIN DANIEL PACKER INN, LTD.,  
A/K/A CAPT. DANIEL PACKER INNE, LTD.,  
AND CAPTAIN DANIEL PACKER INN, LTD.,  
A/K/A CAPT. DANIEL PACKER INNE, LTD.,  
A/K/A CAPTAIN DANIEL PACKER INN,  
BACKER OF LUCILLE J. KILEY D/B/A  
CAPTAIN DANIEL PACKER INN, AND  
CAROL BELLI

SEPTEMBER 5, 2019

**COMPLAINT**

**FIRST COUNT:**

**(UNDERINSURED MOTORIST INSURANCE AS TO CSAA  
AFFINITY INSURANCE COMPANY D/B/A AAA  
INSURANCE COMPANY, BROUGHT BY ESTATE OF  
JOANNA WAKEMAN, BY THEODORE LADWIG,  
EXECUTOR)**

1. On or about March 19, 2019, Theodore Ladwig, Esq. was appointed  
Executor of the Estate of Joanna Wakeman, the Plaintiff's decedent, by the Probate  
Court for the town of Stonington and acting as such Executor, brings this action.

**THE REARDON LAW FIRM, P.C.**

Attorneys at Law

160 Hempstead Street • P.O. Drawer 1430 • New London, CT 06320 • Tel. (860) 442-0444 • Juris No. 102515

2. The Defendant, CSAA Affinity Insurance Company d/b/a AAA Insurance Company (hereinafter "AAA"), is, and at all times mentioned herein was, a corporation duly licensed to transact insurance business in the State of Connecticut and to issue the policy of insurance referred to hereinafter.

3. On or before March 9, 2019, in consideration of the premium specified in the policy, AAA issued to the Plaintiff's decedent, Joanna Wakeman, a policy of insurance wherein AAA agreed to pay all sums which an insured or their legal representative shall be legally entitled to recover as damages from the owner of an underinsured motor vehicle because of bodily injury sustained by a covered person and caused by an accident arising out of the ownership, maintenance or use of the underinsured motor vehicle. The Plaintiff's decedent, Joanna Wakeman, is insured under the terms of said policy, as she was, and is, a named insured at the time of the collision, and has at all times complied with the terms and conditions of said policy.

4. On March 9, 2019, when the policy was in full force and effect, the Plaintiff's decedent, Joanna Wakeman, sustained bodily injuries, resulting in her death, when a vehicle owned and operated by one underinsured motorist violently struck the Plaintiff's decedent as she crossed the roadway on Route 27 in Mystic, Connecticut.

5. The Estate of Joanna Wakeman is legally entitled to recover any damages

caused by the underinsured motorist as the collision and resulting death were the result of the negligent maintenance and use of the underinsured motor vehicle in one or more of the following respects, in that said underinsured operator:

- a. Violated §14-300d of the Connecticut General Statutes by failing to grant the right-of-way to a pedestrian;
- b. Violated §14-300d of the Connecticut General Statutes by failing to sound the horn or otherwise warn the Plaintiff decedent of the impending collision;
- c. Violated §14-300d of the Connecticut General Statutes by failing to exercise due care to avoid colliding with the Plaintiff's decedent, a pedestrian crossing the street;
- d. Violated § 14-300(b) of the Connecticut General Statutes by failing to grant the right of way to the Plaintiff, a pedestrian crossing a roadway;
- e. Violated § 14-300(c) of the Connecticut General Statutes by failing to slow or stop her motor vehicle to avoid striking the Plaintiff, a pedestrian crossing a roadway;
- f. Violated §14-300(c) of the Connecticut General Statutes by failing to grant the right-of-way to a pedestrian crossing the street, including the Plaintiff's decedent;
- g. Violated §14-218a of the Connecticut General Statutes by operating a motor vehicle at an unreasonable rate of speed having no regard for the traffic conditions then and there existing;
- h. Violated §14-80e of the Connecticut General Statutes by failing to equip or maintain said motor vehicle with an adequate horn;

- i. Violated §14-80h of the Connecticut General Statutes by failing to equip or maintain said motor vehicle with adequate brakes;
- j. Violated §14-98a of the Connecticut General Statutes by failing to have adequate tires;
- k. Violated § 14-296aa of the Connecticut General Statutes by operating an electronic device while operating said motor vehicle;
- l. Violated § 14-296aa(b)(1) of the Connecticut General Statutes by operating said motor vehicle while typing, sending, and/or reading text messages from his cellular telephone;
- m. Violated § §14-227a(a) of the Connecticut General Statutes by operating a motor vehicle while under the influence of and/or impaired by liquor and/or drugs;
- n. Failed to grant the right-of-way to a pedestrian crossing the street;
- o. Operated a motor vehicle while impaired or incapacitated from consuming or using alcohol and/or drugs;
- p. Operated said vehicle at an unreasonable rate of speed having due regard for the width, traffic and use of said roadway and the conditions then existing;
- q. Failed to sound her horn or otherwise warn the Plaintiff's decedent of the impending collision;
- r. Failed to turn or stop said motor vehicle so as to avoid colliding with the Plaintiff's decedent, a pedestrian;
- s. Failed to apply the brakes in a timely manner so as to avoid the collision;
- t. Failed to keep a proper lookout and was inattentive;

- u. Failed to grant the right-of-way to a pedestrian within a designated crosswalk;
- v. Failed to keep said motor vehicle under reasonable speed and proper control;
- w. Failed to equip or maintain said motor vehicle with adequate brakes;
- x. Failed to equip or maintain said motor vehicle with an adequate horn;
- y. Operated said motor vehicle while operating a cellular telephone;
- z. Operated said motor vehicle while typing, sending, and/or reading text messages from her cellular telephone;
- aa. Failed to make proper use of his faculties and senses so as to avoid the collision; and
- bb. Failed under all the circumstances then and there existing to take reasonable and proper precautions to avoid the probability of harm to the Plaintiff's decedent.

6. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, Joanna Wakeman sustained severe and permanent injuries to her body including a diffuse subgaleal hemorrhage on the right side of her scalp, a subarachnoid hemorrhage over the base and right lobe of her brain, a dislocated atlanto-occipital joint of the head/neck, a fracture of the cervical vertebral column at C4/C5, a fracture of the thoracic vertebral column at T4/T5, a fracture of the lumbar

vertebral column at L1, a fracture of the right sacroiliac joint, a fracture of the mid right symphysis of the pelvis, a dislocation of the right knee, multiple fractures of the right and left rib cage, and numerous abrasions on her face, mid chest, right abdomen, right back, right flank, left hand, left forearm, right hand, right hip, right knee, and left ankle. Joanna was transported by ambulance to Lawrence and Memorial Hospital where she underwent emergency medical treatment until she died on March 9, 2019. Joanna suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to her loss and damage.

7. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to her loss and damage.

8. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, Joanna Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and her untimely death.

9. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of her family and friends and her

personal, recreational and social relationships and activities, all of which provided her with particular pleasure and happiness.

10. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, her Estate incurred funeral, cremation, and burial expenses necessitated by Joanna's death, all to its loss and damage.

**SECOND COUNT:**                    **(UNDERINSURED MOTORIST INSURANCE AS TO CSAA  
AFFINITY INSURANCE COMPANY D/B/A AAA  
INSURANCE COMPANY, BROUGHT BY ESTATE OF  
SETH WAKEMAN, BY THEODORE LADWIG, EXECUTOR)**

1. On or about March 19, 2019, Theodore Ladwig, Esq. was appointed Executor of the Estate of Seth Wakeman, the Plaintiff's decedent, by the Probate Court for the town of Stonington and acting as such Executor, brings this action.

2. The Defendant, CSAA Affinity Insurance Company d/b/a AAA Insurance Company (hereinafter "AAA"), is, and at all times mentioned herein was, a corporation duly licensed to transact insurance business in the State of Connecticut and to issue the policy of insurance referred to hereinafter.

3. On or before March 9, 2019, in consideration of the premium specified in the policy, AAA issued to the Plaintiff's decedent, Seth Wakeman, a policy of insurance wherein AAA agreed to pay all sums which an insured or their legal representative shall be legally entitled to recover as damages from the owner of an underinsured motor

vehicle because of bodily injury sustained by a covered person and caused by an accident arising out of the ownership, maintenance or use of the underinsured motor vehicle. The Plaintiff's decedent, Seth Wakeman, is insured under the terms of said policy, as he was, and is, a named insured at the time of the collision, and has at all times complied with the terms and conditions of said policy.

4. On March 9, 2019, when the policy was in full force and effect, the Plaintiff's decedent, Seth Wakeman, sustained bodily injuries, resulting in his death, when a vehicle owned and operated by one underinsured motorist violently struck the Plaintiff's decedent as she crossed the roadway on Route 27 in Mystic, Connecticut.

5. The Estate of Seth Wakeman is legally entitled to recover any damages caused by the underinsured motorist as the collision and resulting death were the result of the negligent maintenance and use of the underinsured motor vehicle in one or more of the following respects, in that said underinsured operator:

- a. Violated §14-300d of the Connecticut General Statutes by failing to grant the right-of-way to a pedestrian;
- b. Violated §14-300d of the Connecticut General Statutes by failing to sound the horn or otherwise warn the Plaintiff decedent of the impending collision;
- c. Violated §14-300d of the Connecticut General Statutes by failing to exercise due care to avoid colliding with the Plaintiff's decedent, a pedestrian crossing the street;



- d. Violated § 14-300(b) of the Connecticut General Statutes by failing to grant the right of way to the Plaintiff, a pedestrian crossing a roadway;
- e. Violated § 14-300(c) of the Connecticut General Statutes by failing to slow or stop her motor vehicle to avoid striking the Plaintiff, a pedestrian crossing a roadway;
- f. Violated §14-300(c) of the Connecticut General Statutes by failing to grant the right-of-way to a pedestrian crossing the street, including the Plaintiff's decedent;
- g. Violated §14-218a of the Connecticut General Statutes by operating a motor vehicle at an unreasonable rate of speed having no regard for the traffic conditions then and there existing;
- h. Violated §14-80e of the Connecticut General Statutes by failing to equip or maintain said motor vehicle with an adequate horn;
- i. Violated §14-80h of the Connecticut General Statutes by failing to equip or maintain said motor vehicle with adequate brakes;
- j. Violated §14-98a of the Connecticut General Statutes by failing to have adequate tires;
- k. Violated § 14-296aa of the Connecticut General Statutes by operating an electronic device while operating said motor vehicle;
- l. Violated § 14-296aa(b)(1) of the Connecticut General Statutes by operating said motor vehicle while typing, sending, and/or reading text messages from his cellular telephone;
- m. Violated § §14-227a(a) of the Connecticut General Statutes by operating a motor vehicle while under the influence of and/or impaired by liquor and/or drugs;

- n. Failed to grant the right-of-way to a pedestrian crossing the street;
- o. Operated a motor vehicle while impaired or incapacitated from consuming or using alcohol and/or drugs;
- p. Operated said vehicle at an unreasonable rate of speed having due regard for the width, traffic and use of said roadway and the conditions then existing;
- q. Failed to sound her horn or otherwise warn the Plaintiff's decedent of the impending collision;
- r. Failed to turn or stop said motor vehicle so as to avoid colliding with the Plaintiff's decedent, a pedestrian;
- s. Failed to apply the brakes in a timely manner so as to avoid the collision;
- t. Failed to keep a proper lookout and was inattentive;
- u. Failed to grant the right-of-way to a pedestrian within a designated crosswalk;
- v. Failed to keep said motor vehicle under reasonable speed and proper control;
- w. Failed to equip or maintain said motor vehicle with adequate brakes;
- x. Failed to equip or maintain said motor vehicle with an adequate horn;
- y. Operated said motor vehicle while operating a cellular telephone;
- z. Operated said motor vehicle while typing, sending, and/or reading

text messages from her cellular telephone;

- aa. Failed to make proper use of his faculties and senses so as to avoid the collision; and
- bb. Failed under all the circumstances then and there existing to take reasonable and proper precautions to avoid the probability of harm to the Plaintiff's decedent.

6. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, Seth Wakeman sustained severe and permanent injuries to his body including a subscalpular and subgaleal hemorrhage, a right temporalis muscle hemorrhage, a cerebrum and cerebellum subarachnoid hemorrhage, a soft tissue hemorrhage of the torso, fractures of the right ribs and thoracic vertebrae, lung contusions, visceral lacerations, a left pulmonary edema, a hemoperitoneum, an avulsion pocket to the right lower extremity, fractures of the right tibia and fibula, a dislocated right humerus, and numerous abrasions to the extremities, torso, and head. Seth was transported by ambulance to Lawrence and Memorial Hospital where he underwent emergency medical treatment until he died on March 9, 2019. Seth suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to his loss and damage.

7. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, the Plaintiff's decedent was required to spend various sums of

money for medical care and treatment and diagnostic tests necessitated by said injuries all to his loss and damage.

8. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, Seth Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and his untimely death.

9. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of his family and friends and his personal, recreational and social relationships and activities, all of which provided him with particular pleasure and happiness.

10. As a result of the negligence, carelessness and statutory violations of the uninsured motorist, his Estate incurred funeral, cremation, and burial expenses necessitated by Seth's death, all to its loss and damage.

**THIRD COUNT:**

**(DRAM SHOP ACTION AGAINST LUCILLE J. KILEY, PERMITTEE OF CAPTAIN DANIEL PACKER INN A/K/A CAPTAIN DANIEL PACKER INN, LTD., A/K/A CAPT. DANIEL PACKER INNE, LTD., AND CAPTAIN DANIEL PACKER INN, LTD, A/K/A CAPT. DANIEL PACKER INNE, LTD., A/K/A CAPTAIN DANIEL PACKER INN, BACKER OF LUCILLE J. KILEY D/B/A CAPTAIN DANIEL PACKER INN BROUGHT BY ESTATE OF JOANNA WAKEMAN, BY THEODORE LADWIG, EXECUTOR)**

1. On or about March 19, 2019, Theodore Ladwig, Esq. was appointed Executor of the Estate of Joanna Wakeman, the Plaintiff's decedent, by the Probate Court for the town of Stonington and acting as such Executor, brings this action.

2. The Plaintiff, the Estate of Joanna Wakeman, brought by her executor, Theodore Ladwig, brings this action under §30-102 of the Connecticut General Statutes entitled "Liquor Seller Liable for Damage by Intoxicated Person."

3. On or about March 9, 2019, and for a period of time prior thereto, the Defendant Lucille J. Kiley, was the duly licensed permittee of an establishment known as the Captain Daniel Inn<sup>1</sup>, which was operated, managed, conducted, and controlled as a public bar and restaurant located at 32 Water Street in Mystic, Connecticut.

4. On or about March 9, 2019, and for a period of time prior thereto, the Defendant "Capt. Daniel Packer Inne, LTD," was a corporation organized and existing under the laws of the state of Connecticut with a principal place of business at 32 Water Street in Mystic, Connecticut.

5. On or about March 9, 2019, and for a period of time prior thereto, the Defendant "Captain Daniel Packer Inn, LTD," was the duly licensed backer of Lucille J.

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<sup>1</sup> This business entity is entitled, "Capt. Daniel Packer Inne, LTD." on the Secretary of State's CONCORD website. However, the entity is spelled, "Captain Daniel Packer Inn" and "Captain Daniel Packer Inn LTD" on the State of Connecticut's e-license verification website. The Plaintiffs represent that all three spellings refer to the same business entity.

Kiley, doing business as, the "Captain Daniel Packer Inn", which was operated, managed, conducted and controlled as a public bar and restaurant located at 32 Water Street in Mystic, Connecticut.

6. On said date and at all times mentioned herein, said Defendants owned, operated, managed, conducted and/or controlled said establishment.

7. The Defendants, Lucille J. Kiley, Permittee, and "Captain Daniel Packer Inn, LTD, Backer", acting by and through their agents, servants and/or employees did invite members of the general public to enter and patronize said establishment and to consume alcohol.

8. In the evening hours of March 9, 2019, one Carol Belli was a patron of the Captain Daniel Packer Inn and did consume large quantities of alcoholic beverages supplied by the Defendants acting by and through their agents, servants, managers, supervisors, and/or employees.

9. During the period that Carol Belli was being served and consumed large quantities of alcohol at the Captain Daniel Packer Inn, she became visibly and obviously intoxicated, but the agents, servants, managers, supervisors and/or employees of the Defendants, Kiley and "Captain Daniel Packer Inn, LTD", continued to serve more alcohol to her despite her obvious intoxication.

10. After Carol Belli consumed large quantities of alcoholic beverages at said Packer Inn, she left said establishment and operated her motor vehicle.

11. The Defendants, Kiley and "Captain Daniel Packer Inn, LTD," knew or should have known Carol Belli would be operating a motor vehicle in a grossly intoxicated state upon her departure from said Packer Inn.

12. At approximately 8:00 p.m. on March 9, 2019, while driving her motor vehicle on Route 27 in Mystic, Connecticut, Carol Bellis suddenly and without warning drove through a crosswalk and into Joanna Wakeman.

13. The Plaintiff's decedent's injuries were caused by the collision and were a direct result and consequences of the intoxicated condition of Carol Bellis, who became so intoxicated as a result of being served alcohol by the Defendants Kiley and "Captain Daniel Packer Inn, LTD," acting by and through agents, servants, and/or employees.

14. As a result of the service of alcohol to Carol Bellis while she was obviously and visibly intoxicated, the Plaintiff's decedent, sustained severe and permanent injuries which ultimately caused her death, including a diffuse subgaleal hemorrhage on the right side of her scalp, a subarachnoid hemorrhage over the base and right lobe of her brain, a dislocated atlanto-occipital joint of the head/neck, a fracture of the cervical vertebral column at C4/C5, a fracture of the thoracic vertebral column at T4/T5, a

fracture of the lumbar vertebral column at L1, a fracture of the right sacroiliac joint, a fracture of the mid right symphysis of the pelvis, a dislocation of the right knee, multiple fractures of the right and left rib cage, and numerous abrasions on her face, mid chest, right abdomen, right back, right flank, left hand, left forearm, right hand, right hip, right knee, and left ankle. Joanna was transported by ambulance to Lawrence and Memorial Hospital where she underwent emergency medical treatment until she died on March 9, 2019. Joanna suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to her loss and damage.

15. As a result of said collision, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to her loss and damage.

16. As a result of said collision, Joanna Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and her untimely death.

17. As a result of said collision, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of her family and friends and her personal, recreational and social relationships and activities, all of which provided her with particular pleasure and happiness.



18. As a result of said collision, her Estate incurred funeral, cremation, and burial expenses necessitated by Joanna's death, all to its loss and damage.

19. On March 28, 2019, April 1, 2019, and April 17, 2019, pursuant to § 30-102 of the Connecticut General Statutes, notice of the intention to bring an action pursuant to said statute was served upon the Defendants, Lucille J. Kiley, Permittee of Captain Daniel Packer Inn d/b/a Captain Daniel Packer Inn, Capt. Daniel Packer Inne, LTD., and Captain Daniel Packer Inne, LTD. A copy is attached hereto and marked as **Exhibit A.**

**FOURTH COUNT:**

**(RECKLESS DISPENSING OF LIQUOR AGAINST LUCILLE J. KILEY, PERMITTEE OF CAPTAIN DANIEL PACKER INN A/K/A CAPTAIN DANIEL PACKER INN, LTD., A/K/A CAPT. DANIEL PACKER INNE, LTD., AND CAPTAIN DANIEL PACKER INN, LTD, A/K/A CAPT. DANIEL PACKER INNE, LTD., A/K/A CAPTAIN DANIEL PACKER INN, BACKER OF LUCILLE J. KILEY D/B/A CAPTAIN DANIEL PACKER INN BROUGHT BY ESTATE OF JOANNA WAKEMAN, BY THEODORE LADWIG, EXECUTOR)**

1. On or about March 19, 2019, Theodore Ladwig, Esq. was appointed Executor of the Estate of Joanna Wakeman, the Plaintiff's decedent, by the Probate Court for the town of Stonington and acting as such Executor, brings this action.

2. On or about March 9, 2019, and for a period of time prior thereto, the Defendant Lucille J. Kiley, was the duly licensed permittee of an establishment known

as the "Captain Daniel Inn", which was operated, managed, conducted, and controlled as a public bar and restaurant located at 32 Water Street in Mystic, Connecticut.

3. On or about March 9, 2019, and for a period of time prior thereto, the Defendant "Capt. Daniel Packer Inn, LTD," was a corporation organized and existing under the laws of the state of Connecticut with a principal place of business at 32 Water Street in Mystic, Connecticut.

4. On or about March 9, 2019, and for a period of time prior thereto, the Defendant "Captain Daniel Packer Inn, LTD", was the duly licensed backer of Lucille J. Kiley, doing business as, the "Captain Daniel Packer Inn", which was operated, managed, conducted and controlled as a public bar and restaurant located at 32 Water Street in Mystic, Connecticut.

5. On said date and at all times mentioned herein, said Defendants owned, operated, managed, conducted and/or controlled said establishment.

6. On said date and at all times mentioned herein, the Defendants, acting through their agents, apparent agents, servants, managers, supervisors, and/or employees, invited members of the general public to enter and patronize said establishment and purchase alcohol.

7. On March 9, 2019, Carol Belli was a patron of said establishment and was

sold large quantities of alcoholic beverages by the Defendants, acting by and through their agents, apparent agents, servants, managers, supervisor, and/or employees.

8. During the period that Carol Belli was being served and consumed large quantities of alcoholic beverages at said establishment, she became visibly and obviously intoxicated, but the agents, apparent agents, servants, managers, supervisors, and/or employees of the Defendants, continued to serve more alcohol to Carol Belli despite her obvious intoxication.

9. After Carol Belli was grossly and obviously intoxicated, she left said establishment sometime in the evening hours of March 9, 2019 and operated her motor vehicle.

10. The Defendants, Kiley and "Captain Daniel Packer Inn, LTD," knew or should have known Carol Belli would be operating a motor vehicle in a grossly intoxicated state upon her departure from said Packer Inn.

11. At approximately 8:00 p.m. on March 9, 2019, while driving her motor vehicle on Route 27 in Mystic, Connecticut, Carol Bellis suddenly and without warning drove through a crosswalk at a high rate of speed and into the Plaintiff's decedent, causing her to suffer severe and permanent injuries which ultimately caused her death.

12. The Plaintiff decedent's injuries and death were caused by said collision

and were a direct result and consequence of the reckless and/or willful conduct of the Defendants acting by and through their agents, apparent agents, servants, and/or employees, in one or more of the following aspects, in that they:

- a. Recklessly permitted Carol Belli to be served such large quantities of alcohol when they knew, or should have known, such quantities would cause her to become grossly intoxicated so that her operation of a motor vehicle would endanger members the general public, including the Plaintiff decedent;
- b. Recklessly permitted Carol Belli to be served such large quantities of alcoholic beverages that they knew, or should have known, that her faculties would be so impaired so that she was unable to safely operate a motor vehicle;
- c. Recklessly continued to serve alcoholic beverages to Carol Belli after they knew, or should have known, that she was grossly inebriated and unable to safely operate a motor vehicle;
- d. Recklessly permitted Carol Belli to become obviously and grossly intoxicated in their presence by dispensing large quantities of alcoholic beverages to her and thereafter permitted her to leave the establishment and operate a motor vehicle on public roads in total disregard for the safety of the public, including the Plaintiff decedent;
- e. Recklessly allowed Carol Belli to leave their bar and restaurant in a grossly intoxicated state, knowing she was about to operate a motor vehicle when they should have made alternative transportation arrangements for her to be taken to her home;
- f. Recklessly disregarded the necessity of proper training of their personnel regarding the responsible dispensing of alcohol to patrons; and

- g. Recklessly disregarded the necessity of implementing proper protocols for the responsible dispensing of alcohol to patrons.

13. As a result of the reckless conduct of the Defendants, the Plaintiff's decedent, sustained severe and permanent injuries which ultimately caused her death, including a diffuse subgaleal hemorrhage on the right side of her scalp, a subarachnoid hemorrhage over the base and right lobe of her brain, a dislocated atlanto-occipital joint of the head/neck, a fracture of the cervical vertebral column at C4/C5, a fracture of the thoracic vertebral column at T4/T5, a fracture of the lumbar vertebral column at L1, a fracture of the right sacroiliac joint, a fracture of the mid right symphysis of the pelvis, a dislocation of the right knee, multiple fractures of the right and left rib cage, and numerous abrasions on her face, mid chest, right abdomen, right back, right flank, left hand, left forearm, right hand, right hip, right knee, and left ankle. Joanna was transported by ambulance to Lawrence and Memorial Hospital where she underwent emergency medical treatment until she died on March 9, 2019. Joanna suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to her loss and damage.

14. As a result of the reckless conduct of the Defendants, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to her loss and damage.

15. As a result of the reckless conduct of the Defendants, Joanna Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and her untimely death.

16. As a result of the reckless conduct of the Defendants, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of her family and friends and her personal, recreational and social relationships and activities, all of which provided her with particular pleasure and happiness.

17. As a result of the reckless conduct of the Defendants, her Estate incurred funeral, cremation, and burial expenses necessitated by Joanna's death, all to its loss and damage.

**FIFTH COUNT:**

**(DRAM SHOP ACTION AGAINST LUCILLE J. KILEY, PERMITTEE OF CAPTAIN DANIEL PACKER INN A/K/A CAPTAIN DANIEL PACKER INN, LTD., A/K/A CAPT. DANIEL PACKER INNE, LTD., AND CAPTAIN DANIEL PACKER INN, LTD, A/K/A CAPT. DANIEL PACKER INNE, LTD., A/K/A CAPTAIN DANIEL PACKER INN, BACKER OF LUCILLE J. KILEY D/B/A CAPTAIN DANIEL PACKER INN BROUGHT BY ESTATE OF SETH WAKEMAN, BY THEODORE LADWIG, EXECUTOR)**

1. On or about March 19, 2019, Theodore Ladwig, Esq. was appointed Executor of the Estate of Joanna Wakeman, the Plaintiff's decedent, by the Probate

Court for the town of Stonington and acting as such Executor, brings this action.

2. The Plaintiff, the Estate of Seth Wakeman, brought by her executor, Theodore Ladwig, brings this action under §30-102 of the Connecticut General Statutes entitled "Liquor Seller Liable for Damage by Intoxicated Person."

3. On or about March 9, 2019, and for a period of time prior thereto, the Defendant Lucille J. Kiley, was the duly licensed permittee of an establishment known as the "Captain Daniel Inn," which was operated, managed, conducted, and controlled as a public bar and restaurant located at 32 Water Street in Mystic, Connecticut.

4. On or about March 9, 2019, and for a period of time prior thereto, the Defendant "Capt. Daniel Packer Inn, LTD," was a corporation organized and existing under the laws of the state of Connecticut with a principal place of business at 32 Water Street in Mystic, Connecticut.

5. On or about March 9, 2019, and for a period of time prior thereto, the Defendant "Captain Daniel Packer Inn, LTD," was the duly licensed backer of Lucille J. Kiley, doing business as, the "Captain Daniel Packer Inn," which was operated, managed, conducted and controlled as a public bar and restaurant located at 32 Water Street in Mystic, Connecticut.

6. On said date and at all times mentioned herein, said Defendants owned,

operated, managed, conducted and/or controlled said establishment.

7. The Defendants, Lucille J. Kiley, Permittee, and "Captain Daniel Packer Inn, LTD, Backer," acting by and through their agents, servants and/or employees did invite members of the general public to enter and patronize said establishment and to consume alcohol.

8. In the evening hours of March 9, 2019, one Carol Belli was a patron of the "Captain Daniel Packer Inn" and did consume large quantities of alcoholic beverages supplied by the Defendants acting by and through their agents, servants, managers, supervisors, and/or employees.

9. During the period that Carol Belli was being served and consumed large quantities of alcohol at the Captain Daniel Packer Inn, she became visibly and obviously intoxicated, but the agents, servants, managers, supervisors and/or employees of the Defendants, Kiley and "Captain Daniel Packer Inn, LTD," continued to serve more alcohol to her despite her obvious intoxication.

10. After Carol Belli consumed large quantities of alcoholic beverages at said Packer Inn, she left said establishment and operated her motor vehicle.

11. The Defendants, Kiley and "Captain Daniel Packer Inn, LTD," knew or should have known Carol Belli would be operating a motor vehicle in a grossly



intoxicated state upon her departure from said Packer Inn.

12. At approximately 8:00 p.m. on March 9, 2019, while driving her motor vehicle on Route 27 in Mystic, Connecticut, Carol Bellis suddenly and without warning drove at a high rate of speed through a crosswalk and into Seth Wakeman.

13. The Plaintiff's decedent's injuries were caused by the collision and were a direct result and consequences of the intoxicated condition of Carol Bellis, who became so intoxicated as a result of being served alcohol by the Defendants Kiley and "Captain Daniel Packer Inn, LTD," acting by and through agents, servants, and/or employees.

14. As a result of the service of alcohol to Carol Bellis while she was obviously and visibly intoxicated, the Plaintiff's decedent, sustained severe and permanent injuries which ultimately caused his death, including a subscalpular and subgaleal hemorrhage, a right temporalis muscle hemorrhage, a cerebrum and cerebellum subarachnoid hemorrhage, a soft tissue hemorrhage of the torso, fractures of the right ribs and thoracic vertebrae, lung contusions, visceral lacerations, a left pulmonary edema, a hemoperitoneum, an avulsion pocket to the right lower extremity, fractures of the right tibia and fibula, a dislocated right humerus, and numerous abrasions to the extremities, torso, and head. Seth was transported by ambulance to Lawrence and Memorial Hospital where he underwent emergency medical treatment until he died on March 9,

2019. Seth suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to his loss and damage.

15. As a result of said collision, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to his loss and damage.

16. As a result of said collision, Seth Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and his untimely death.

17. As a result of said collision, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of his family and friends and his personal, recreational and social relationships and activities, all of which provided him with particular pleasure and happiness.

18. As a result of said collision, his Estate incurred funeral, cremation, and burial expenses necessitated by Seth's death, all to its loss and damage.

19. On March 28, 2019, April 1, 2019, and April 17, 2019, pursuant to § 30-102 of the Connecticut General Statutes, notice of the intention to bring an action pursuant to said statute was served upon the Defendants, Lucille J. Kiley, Permittee of Captain Daniel Packer Inn d/b/a Captain Daniel Packer Inn, Capt. Daniel Packer Inne,

LTD., and Captain Daniel Packer Inn, LTD. A copy is attached hereto and marked as **Exhibit A.**

**SIXTH COUNT:**

**(RECKLESS DISPENSING OF LIQUOR AGAINST LUCILLE J. KILEY, PERMITTEE OF CAPTAIN DANIEL PACKER INN A/K/A CAPTAIN DANIEL PACKER INN, LTD., A/K/A CAPT. DANIEL PACKER INNE, LTD., AND CAPTAIN DANIEL PACKER INN, LTD, A/K/A CAPT. DANIEL PACKER INNE, LTD., A/K/A CAPTAIN DANIEL PACKER INN, BACKER OF LUCILLE J. KILEY D/B/A CAPTAIN DANIEL PACKER INN BROUGHT BY ESTATE OF SETH WAKEMAN, BY THEODORE LADWIG, EXECUTOR)**

1. On or about March 19, 2019, Theodore Ladwig, Esq. was appointed Executor of the Estate of Seth Wakeman, the Plaintiff's decedent, by the Probate Court for the town of Stonington and acting as such Executor, brings this action.

2. On or about March 9, 2019, and for a period of time prior thereto, the Defendant Lucille J. Kiley, was the duly licensed permittee of an establishment known as the "Captain Daniel Inn", which was operated, managed, conducted, and controlled as a public bar and restaurant located at 32 Water Street in Mystic, Connecticut.

3. On or about March 9, 2019, and for a period of time prior thereto, the Defendant "Capt. Daniel Packer Inn, LTD," was a corporation organized and existing under the laws of the state of Connecticut with a principal place of business at 32 Water

Street in Mystic, Connecticut.

4. On or about March 9, 2019, and for a period of time prior thereto, the Defendant "Captain Daniel Packer Inn, LTD," was the duly licensed backer of Lucille J. Kiley, doing business as, the "Captain Daniel Packer Inn," which was operated, managed, conducted and controlled as a public bar and restaurant located at 32 Water Street in Mystic, Connecticut.

5. On said date and at all times mentioned herein, said Defendants owned, operated, managed, conducted and/or controlled said establishment.

6. On said date and at all times mentioned herein, the Defendants, acting through their agents, apparent agents, servants, managers, supervisors, and/or employees, invited members of the general public to enter and patronize said establishment and purchase alcohol.

7. On March 9, 2019, Carol Belli was a patron of said establishment and was sold large quantities of alcoholic beverages by the Defendants, acting by and through their agents, apparent agents, servants, managers, supervisor, and/or employees.

8. During the period that Carol Belli was being served and consumed large quantities of alcoholic beverages at said establishment, she became visibly and obviously intoxicated, but the agents, apparent agents, servants, managers,

supervisors, and/or employees of the Defendants, continued to serve more alcohol to Carol Belli despite her obvious intoxication.

9. After Carol Belli was grossly and obviously intoxicated, she left said establishment sometime in the evening hours of March 9, 2019 and operated her motor vehicle.

10. The Defendants, Kiley and "Captain Daniel Packer Inn, LTD," knew or should have known Carol Belli would be operating a motor vehicle in a grossly intoxicated state upon her departure from said Packer Inn.

11. At approximately 8:00 p.m. on March 9, 2019, while driving her motor vehicle on Route 27 in Mystic, Connecticut, Carol Bellis suddenly and without warning drove through a crosswalk at a high rate of speed and into the Plaintiff's decedent, causing him to suffer severe and permanent injuries which ultimately caused his death.

12. The Plaintiff decedent's injuries and death were caused by said collision and were a direct result and consequence of the reckless and/or willful conduct of the Defendants acting by and through their agents, apparent agents, servants, and/or employees, in one or more of the following aspects, in that they:

- a. Recklessly permitted Carol Belli to be served such large quantities of alcohol when they knew, or should have known, such quantities would cause her to become grossly intoxicated so that her operation of a motor vehicle would endanger members the general

public, including the Plaintiff decedent;

- b. Recklessly permitted Carol Belli to be served such large quantities of alcoholic beverages that they knew, or should have known, that her faculties would be so impaired so that she was unable to safely operate a motor vehicle;
- c. Recklessly continued to serve alcoholic beverages to Carol Belli after they knew, or should have known, that she was grossly inebriated and unable to safely operate a motor vehicle;
- d. Recklessly permitted Carol Belli to become obviously and grossly intoxicated in their presence by dispensing large quantities of alcoholic beverages to her and thereafter permitted her to leave the establishment and operate a motor vehicle on public roads in total disregard for the safety of the public, including the Plaintiff decedent;
- e. Recklessly allowed Carol Belli to leave their bar and restaurant in a grossly intoxicated state, knowing she was about to operate a motor vehicle when they should have made alternative transportation arrangements for her to be taken to her home;
- f. Recklessly disregarded the necessity of proper training of their personnel regarding the responsible dispensing of alcohol to patrons; and
- g. Recklessly disregarded the necessity of implementing proper protocols for the responsible dispensing of alcohol to patrons.

13. As a result of the reckless conduct of the Defendants, the Plaintiff's decedent, sustained severe and permanent injuries which ultimately caused his death, including a subscalpular and subgaleal hemorrhage, a right temporalis muscle hemorrhage, a cerebrum and cerebellum subarachnoid hemorrhage, a soft tissue

hemorrhage of the torso, fractures of the right ribs and thoracic vertebrae, lung contusions, visceral lacerations, a left pulmonary edema, a hemoperitoneum, an avulsion pocket to the right lower extremity, fractures of the right tibia and fibula, a dislocated right humerus, and numerous abrasions to the extremities, torso, and head. Seth was transported by ambulance to Lawrence and Memorial Hospital where he underwent emergency medical treatment until he died on March 9, 2019. Seth suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to his loss and damage.

14. As a result of the reckless conduct of the Defendants, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to his loss and damage.

15. As a result of the reckless conduct of the Defendants, Seth Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and his untimely death.

16. As a result of the reckless conduct of the Defendants, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of his family and friends and his personal, recreational and social relationships and activities, all of which provided him with particular pleasure and

happiness.

17. As a result of the reckless conduct of the Defendants, his Estate incurred funeral, cremation, and burial expenses necessitated by Seth's death, all to its loss and damage.

**SEVENTH COUNT:**      **(WRONGFUL DEATH ACTION AS TO DEFENDANT  
CAROL BELLI BROUGHT BY ESTATE OF JOANNA  
WAKEMAN, BY THEODORE LADWIG, EXECUTOR)**

1. On or about March 19, 2019, Theodore Ladwig, Esq. was appointed Executor of the Estate of Joanna Wakeman, the Plaintiff's decedent, by the Probate Court for the town of Stonington and acting as such Executor, brings this action for the injuries and death of Joanna Wakeman, pursuant to §52-555 of the Connecticut General Statutes.

2. On March 9, 2019, the Plaintiff's decedent, Joanna Wakeman, was a pedestrian crossing Route 27 in Mystic, Connecticut.

3. On said date and at said time, the Defendant, Carol Belli, was the owner and operator of a motor vehicle traveling on Route 27 in Mystic, Connecticut.

4. On said date and at said time, the Plaintiff's decedent, Joanna Wakeman, was suddenly and without warning violently struck by the Defendant's motor vehicle causing her to fall to the pavement and suffer the injuries hereinafter described.

5. Said collision and the injuries suffered by the Plaintiff's decedent, Joanna



Wakeman, were caused by the negligence, carelessness, and statutory violations of the Defendant, Carol Belli, in one or more of the following respects, in that she:

- a. Violated §14-300d of the Connecticut General Statutes by failing to grant the right-of-way to a pedestrian;
- b. Violated §14-300d of the Connecticut General Statutes by failing to sound the horn or otherwise warn the Plaintiff decedent of the impending collision;
- c. Violated §14-300d of the Connecticut General Statutes by failing to exercise due care to avoid colliding with the Plaintiff's decedent, a pedestrian crossing the street;
- d. Violated § 14-300(b) of the Connecticut General Statutes by failing to grant the right of way to the Plaintiff, a pedestrian crossing a roadway;
- e. Violated § 14-300(c) of the Connecticut General Statutes by failing to slow or stop her motor vehicle to avoid striking the Plaintiff, a pedestrian crossing a roadway;
- f. Violated §14-300(c) of the Connecticut General Statutes by failing to grant the right-of-way to a pedestrian crossing the street, including the Plaintiff's decedent;
- g. Violated §14-218a of the Connecticut General Statutes by operating a motor vehicle at an unreasonable rate of speed having no regard for the traffic conditions then and there existing;
- h. Violated §14-80e of the Connecticut General Statutes by failing to equip or maintain said motor vehicle with an adequate horn;
- i. Violated §14-80h of the Connecticut General Statutes by failing to equip or maintain said motor vehicle with adequate brakes;

- j. Violated §14-98a of the Connecticut General Statutes by failing to have adequate tires;
- k. Violated § 14-296aa of the Connecticut General Statutes by operating an electronic device while operating said motor vehicle;
- l. Violated § 14-296aa(b)(1) of the Connecticut General Statutes by operating said motor vehicle while typing, sending, and/or reading text messages from his cellular telephone;
- m. Violated § §14-227a(a) of the Connecticut General Statutes by operating a motor vehicle while under the influence of and/or impaired by liquor and/or drugs;
- n. Failed to grant the right-of-way to a pedestrian crossing the street;
- o. Operated a motor vehicle while impaired or incapacitated from consuming or using alcohol and/or drugs;
- p. Operated said vehicle at an unreasonable rate of speed having due regard for the width, traffic and use of said roadway and the conditions then existing;
- q. Failed to sound her horn or otherwise warn the Plaintiff's decedent of the impending collision;
- r. Failed to turn or stop said motor vehicle so as to avoid colliding with the Plaintiff's decedent, a pedestrian;
- s. Failed to apply the brakes in a timely manner so as to avoid the collision;
- t. Failed to keep a proper lookout and was inattentive;
- u. Failed to grant the right-of-way to a pedestrian within a designated

crosswalk;

- v. Failed to keep said motor vehicle under reasonable speed and proper control;
- w. Failed to equip or maintain said motor vehicle with adequate brakes;
- x. Failed to equip or maintain said motor vehicle with an adequate horn;
- y. Operated said motor vehicle while operating a cellular telephone;
- z. Operated said motor vehicle while typing, sending, and/or reading text messages from her cellular telephone;
- aa. Failed to make proper use of his faculties and senses so as to avoid the collision; and
- bb. Failed under all the circumstances then and there existing to take reasonable and proper precautions to avoid the probability of harm to the Plaintiff's decedent.

6. As a result of the negligence, carelessness, and statutory violations of the Defendant, Joanna Wakeman sustained severe and permanent injuries to her body including a diffuse subgaleal hemorrhage on the right side of her scalp, a subarachnoid hemorrhage over the base and right lobe of her brain, a dislocated atlanto-occipital joint of the head/neck, a fracture of the cervical vertebral column at C4/C5, a fracture of the thoracic vertebral column at T4/T5, a fracture of the lumbar vertebral column at L1, a fracture of the right sacroiliac joint, a fracture of the mid right symphysis of the pelvis, a

dislocation of the right knee, multiple fractures of the right and left rib cage, and numerous abrasions on her face, mid chest, right abdomen, right back, right flank, left hand, left forearm, right hand, right hip, right knee, and left ankle. Joanna was transported by ambulance to Lawrence and Memorial Hospital where she underwent emergency medical treatment until she died on March 9, 2019. Joanna suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to her loss and damage.

7. As a result of the negligence, carelessness, and statutory violations of the Defendant, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to her loss and damage.

8. As a further result of the negligence, carelessness, and statutory violations of the Defendant, Joanna Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and her untimely death.

9. As a further result of negligence, carelessness, and statutory violations of the Defendant, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of her family and friends and her personal, recreational and social relationships and activities, all of which provided her with

particular pleasure and happiness.

10. As a further result of the negligence, carelessness and statutory violations of the Defendant, her Estate incurred funeral, cremation, and burial expenses necessitated by Joanna's death, all to its loss and damage.

**EIGHTH COUNT:** (WRONGFUL DEATH ACTION- RECKLESSNESS  
PURSUANT TO CONNECTICUT GENERAL STATUTES  
§14-295, AS TO DEFENDANT CAROL BELLI BROUGHT  
BY ESTATE OF JOANNA WAKEMAN, BY THEODORE  
LADWIG, EXECUTOR)

1-4. Paragraphs One (1) through Four (4) of the Seventh Count are hereby incorporated as Paragraphs One (1) through Four (4) of this the Eighth Count as if more fully set forth herein.

5. Said collision and the injuries suffered by Joanna Wakeman were caused by the reckless conduct and statutory violations of the Defendant, Carol Belli, in one or more of the following respects, in that she:

- a. Violated §14-218a of the Connecticut General Statutes by operating said motor vehicle with conscious disregard for the safety of others, including the Plaintiff's decedent, by operating said motor vehicle at an unreasonably fast rate of speed through a crosswalk when she knew that pedestrians would be utilizing the heavily traveled crosswalk and crossing the street, yet chose to proceed anyway at an unreasonably fast rate of speed when she knew or should have known of the risk and extreme danger said conduct posed to others including the Plaintiff's decedent;

- b. Violated §14-222 of the Connecticut General Statutes by operating said motor vehicle in a reckless and dangerous manner without having due regard to the width, traffic, and use of the roadway, and at an unreasonable rate of speed, placing the Plaintiff's decedent and others in extreme danger; and
- c. Violated §14-227a of the Connecticut General Statutes by operating said motor vehicle while under the influence of alcohol and/or other drugs.

6. Said reckless conduct and statutory violations were in violation of Connecticut General Statutes Section 14-295 and were a substantial factor in causing the collision and the Plaintiff's decedent's injuries and damages which resulted therefrom.

7. As a result of the reckless conduct and statutory violations of the Defendant, Joanna Wakeman sustained severe and permanent injuries to her body including a diffuse subgaleal hemorrhage on the right side of her scalp, a subarachnoid hemorrhage over the base and right lobe of her brain, a dislocated atlanto-occipital joint of the head/neck, a fracture of the cervical vertebral column at C4/C5, a fracture of the thoracic vertebral column at T4/T5, a fracture of the lumbar vertebral column at L1, a fracture of the right sacroiliac joint, a fracture of the mid right symphysis of the pelvis, a dislocation of the right knee, multiple fractures of the right and left rib cage, and numerous abrasions on her face, mid chest, right abdomen, right back, right flank, left hand, left forearm, right hand, right hip, right knee, and left ankle. Joanna was

transported by ambulance to Lawrence and Memorial Hospital where she underwent emergency medical treatment until she died on March 9, 2019. Joanna suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to her loss and damage.

8. As a result of the reckless conduct and statutory violations of the Defendant, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to her loss and damage.

9. As a result of the reckless conduct and statutory violations of the Defendant, Joanna Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and her untimely death.

10. As a result of the reckless conduct and statutory violations of the Defendant, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of her family and friends and her personal, recreational and social relationships and activities, all of which provided her with particular pleasure and happiness.

11. As a further result of the reckless conduct and statutory violations of the Defendant, her Estate incurred funeral, cremation, and burial expenses necessitated by

Joanna's death, all to its loss and damage.

**NINTH COUNT:**                    **(WRONGFUL DEATH ACTION- COMMON LAW  
RECKLESSNESS, AS TO DEFENDANT CAROL BELLI  
BROUGHT BY ESTATE OF JOANNA WAKEMAN, BY  
THEODORE LADWIG, EXECUTOR)**

1-4. Paragraphs One (1) through Four (4) of the Seventh Count are hereby incorporated as Paragraphs One (1) through Four (4) of this the Ninth Count as if more fully set forth herein.

5. Said collision and the injuries and death suffered by Joanna Wakeman were caused by the reckless conduct of the Defendant, Carol Belli, in one or more of the following respects, in that she:

- a. Operated said motor vehicle with conscious disregard for the safety of others, including the Plaintiff's decedent, by accelerating said motor vehicle at a high rate of speed and while under the influence of alcohol and/or drugs, through a heavily traveled crosswalk and directly into the path of the Plaintiff's decedent and other pedestrians crossing the roadway; and
  - b. Consciously and with deliberate disregard for the safety of others, operated a motor vehicle in a reckless and dangerous manner without having due regard to the width, traffic, and use of the roadway, and at an excessive rate of speed given the circumstances then and there existing when she knew or should of known the danger that it posed to others, including the Plaintiff's decedent, yet ignored such danger.
6. Said reckless conduct was a substantial factor in causing the collision and



the Plaintiff decedent's injuries and damages which resulted therefrom.

7. As a result of the reckless conduct of the Defendant, Joanna Wakeman sustained severe and permanent injuries to her body including a diffuse subgaleal hemorrhage on the right side of her scalp, a subarachnoid hemorrhage over the base and right lobe of her brain, a dislocated atlanto-occipital joint of the head/neck, a fracture of the cervical vertebral column at C4/C5, a fracture of the thoracic vertebral column at T4/T5, a fracture of the lumbar vertebral column at L1, a fracture of the right sacroiliac joint, a fracture of the mid right symphysis of the pelvis, a dislocation of the right knee, multiple fractures of the right and left rib cage, and numerous abrasions on her face, mid chest, right abdomen, right back, right flank, left hand, left forearm, right hand, right hip, right knee, and left ankle. Joanna was transported by ambulance to Lawrence and Memorial Hospital where she underwent emergency medical treatment until she died on March 9, 2019. Joanna suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to her loss and damage.

8. As a result of the reckless conduct of the Defendant, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to her loss and damage.

9. As a result of the reckless conduct of the Defendant, Joanna Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and her untimely death.

10. As a result of the reckless conduct of the Defendant, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of her family and friends and her personal, recreational and social relationships and activities, all of which provided her with particular pleasure and happiness.

11. As a further result of the reckless conduct of the Defendant, her Estate incurred funeral, cremation, and burial expenses necessitated by Joanna's death, all to its loss and damage.

**TENTH COUNT:**

**(WRONGFUL DEATH ACTION AS TO DEFENDANT  
CAROL BELLI BROUGHT BY ESTATE OF SETH  
WAKEMAN, BY THEODORE LADWIG, EXECUTOR)**

1. On or about March 19, 2019, Theodore Ladwig, Esq. was appointed Executor of the Estate of Seth Wakeman, the Plaintiff's decedent, by the Probate Court for the town of Stonington and acting as such Executor, brings this action for the injuries and death of Seth Wakeman, pursuant to §52-555 of the Connecticut General Statutes.

2. On March 9, 2019, the Plaintiff's decedent, Seth Wakeman, was a

pedestrian crossing Route 27 in Mystic, Connecticut.

3. On said date and at said time, the Defendant, Carol Belli, was the owner and operator of a motor vehicle traveling on Route 27 in Mystic, Connecticut.

4. On said date and at said time, the Plaintiff's decedent, Seth Wakeman, was suddenly and without warning violently struck by the Defendant's motor vehicle causing him to fall to the pavement and suffer the injuries hereinafter described.

5. Said collision and the injuries suffered by the Plaintiff's decedent, Seth Wakeman, were caused by the negligence, carelessness, and statutory violations of the Defendant, Carol Belli, in one or more of the following respects, in that she:

- a. Violated §14-300d of the Connecticut General Statutes by failing to grant the right-of-way to a pedestrian;
- b. Violated §14-300d of the Connecticut General Statutes by failing to sound the horn or otherwise warn the Plaintiff decedent of the impending collision;
- c. Violated §14-300d of the Connecticut General Statutes by failing to exercise due care to avoid colliding with the Plaintiff's decedent, a pedestrian crossing the street;
- d. Violated § 14-300(b) of the Connecticut General Statutes by failing to grant the right of way to the Plaintiff, a pedestrian crossing a roadway;
- e. Violated § 14-300(c) of the Connecticut General Statutes by failing to slow or stop her motor vehicle to avoid striking the Plaintiff, a pedestrian crossing a roadway;

- f. Violated §14-300(c) of the Connecticut General Statutes by failing to grant the right-of-way to a pedestrian crossing the street, including the Plaintiff's decedent;
- g. Violated §14-218a of the Connecticut General Statutes by operating a motor vehicle at an unreasonable rate of speed having no regard for the traffic conditions then and there existing;
- h. Violated §14-80e of the Connecticut General Statutes by failing to equip or maintain said motor vehicle with an adequate horn;
- i. Violated §14-80h of the Connecticut General Statutes by failing to equip or maintain said motor vehicle with adequate brakes;
- j. Violated §14-98a of the Connecticut General Statutes by failing to have adequate tires;
- k. Violated § 14-296aa of the Connecticut General Statutes by operating an electronic device while operating said motor vehicle;
- l. Violated § 14-296aa(b)(1) of the Connecticut General Statutes by operating said motor vehicle while typing, sending, and/or reading text messages from his cellular telephone;
- m. Violated § §14-227a(a) of the Connecticut General Statutes by operating a motor vehicle while under the influence of and/or impaired by liquor and/or drugs;
- n. Failed to grant the right-of-way to a pedestrian crossing the street;
- o. Operated a motor vehicle while impaired or incapacitated from consuming or using alcohol and/or drugs;
- p. Operated said vehicle at an unreasonable rate of speed having due regard for the width, traffic and use of said roadway and the

conditions then existing;

- q. Failed to sound her horn or otherwise warn the Plaintiff's decedent of the impending collision;
- r. Failed to turn or stop said motor vehicle so as to avoid colliding with the Plaintiff's decedent, a pedestrian;
- s. Failed to apply the brakes in a timely manner so as to avoid the collision;
- t. Failed to keep a proper lookout and was inattentive;
- u. Failed to grant the right-of-way to a pedestrian within a designated crosswalk;
- v. Failed to keep said motor vehicle under reasonable speed and proper control;
- w. Failed to equip or maintain said motor vehicle with adequate brakes;
- x. Failed to equip or maintain said motor vehicle with an adequate horn;
- y. Operated said motor vehicle while operating a cellular telephone;
- z. Operated said motor vehicle while typing, sending, and/or reading text messages from her cellular telephone;
- aa. Failed to make proper use of his faculties and senses so as to avoid the collision; and
- bb. Failed under all the circumstances then and there existing to take reasonable and proper precautions to avoid the probability of harm to the Plaintiff's decedent.

6. As a result of the negligence, carelessness, and statutory violations of the Defendant, Seth Wakeman sustained severe and permanent injuries to his body including a subscalpular and subgaleal hemorrhage, a right temporalis muscle hemorrhage, a cerebrum and cerebellum subarachnoid hemorrhage, a soft tissue hemorrhage of the torso, fractures of the right ribs and thoracic vertebrae, lung contusions, visceral lacerations, a left pulmonary edema, a hemoperitoneum, an avulsion pocket to the right lower extremity, fractures of the right tibia and fibula, a dislocated right humerus, and numerous abrasions to the extremities, torso, and head. Seth was transported by ambulance to Lawrence and Memorial Hospital where he underwent emergency medical treatment until he died on March 9, 2019. Seth suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to his loss and damage.

7. As a result of the negligence, carelessness, and statutory violations of the Defendant, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to his loss and damage.

8. As a result of the negligence, carelessness, and statutory violations of the Defendant, Seth Wakeman suffered severe physical and mental pain, anguish and

anxiety, as well as conscious pain and suffering and his untimely death.

9. As a result of the negligence, carelessness, and statutory violations of the Defendant, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of his family and friends and his personal, recreational and social relationships and activities, all of which provided him with particular pleasure and happiness.

10. As a further result of the negligent conduct of the Defendant, his Estate incurred funeral, cremation, and burial expenses necessitated by Seth's death, all to its loss and damage.

**ELEVENTH COUNT:** (WRONGFUL DEATH ACTION- RECKLESSNESS  
PURSUANT TO CONNECTICUT GENERAL STATUTES  
§14-295, AS TO DEFENDANT CAROL BELLI BROUGHT  
BY ESTATE OF SETH WAKEMAN, BY THEODORE  
LADWIG, EXECUTOR)

1-4. Paragraphs One (1) through Four (4) of the Tenth Count are hereby incorporated as Paragraphs One (1) through Four (4) of this the Eleventh Count as if more fully set forth herein.

5. Said collision and the injuries suffered by Seh Wakeman were caused by the reckless conduct and statutory violations of the Defendant, Carol Belli, in one or more of the following respects, in that she:

a. Violated §14-218a of the Connecticut General Statutes by operating said

motor vehicle with conscious disregard for the safety of others, including the Plaintiff's decedent, by operating said motor vehicle at an unreasonably fast rate of speed through a crosswalk when she knew that pedestrians would be utilizing the heavily traveled crosswalk and crossing the street, yet chose to proceed anyway at an unreasonably fast rate of speed when she knew or should have known of the risk and extreme danger said conduct posed to others including the Plaintiff's decedent;

- b. Violated §14-222 of the Connecticut General Statutes by operating said motor vehicle in a reckless and dangerous manner without having due regard to the width, traffic, and use of the roadway, and at an unreasonable rate of speed, placing the Plaintiff's decedent and others in extreme danger; and
- c. Violated §14-227a of the Connecticut General Statutes by operating said motor vehicle while under the influence of alcohol and/or other drugs.

- 6. Said reckless conduct and statutory violations were in violation of

Connecticut General Statutes Section 14-295 and were a substantial factor in causing the collision and the Plaintiff's decedent's injuries and damages which resulted therefrom.

- 7. As a result of the reckless conduct and statutory violations of the Defendant, Seth Wakeman sustained severe and permanent injuries to his body including a subscalpular and subgaleal hemorrhage, a right temporalis muscle hemorrhage, a cerebrum and cerebellum subarachnoid hemorrhage, a soft tissue hemorrhage of the torso, fractures of the right ribs and thoracic vertebrae, lung contusions, visceral lacerations, a left pulmonary edema, a hemoperitoneum, an



avulsion pocket to the right lower extremity, fractures of the right tibia and fibula, a dislocated right humerus, and numerous abrasions to the extremities, torso, and head. Seth was transported by ambulance to Lawrence and Memorial Hospital where he underwent emergency medical treatment until he died on March 9, 2019. Seth suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to his loss and damage.

8. As a result of the reckless conduct and statutory violations of the Defendant, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to his loss and damage.

9. As a result of the reckless conduct and statutory violations of the Defendant, Seth Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and his untimely death.

10. As a result of the reckless conduct and statutory violations of the Defendant, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of his family and friends and his personal, recreational and social relationships and activities, all of which provided him with particular pleasure and happiness.

11. As a further result of the reckless conduct of the Defendant, his Estate incurred funeral, cremation, and burial expenses necessitated by Seth's death, all to its loss and damage.

**TWELFTH COUNT:**      **(WRONGFUL DEATH ACTION- COMMON LAW RECKLESSNESS, AS TO DEFENDANT CAROL BELLI BROUGHT BY ESTATE OF SETH WAKEMAN, BY THEODORE LADWIG, EXECUTOR)**

1-4. Paragraphs One (1) through Four (4) of the Tenth Count are hereby incorporated as Paragraphs One (1) through Four (4) of this the Twelfth Count as if more fully set forth herein.

5. Said collision and the injuries and death suffered by Seth Wakeman were caused by the reckless conduct of the Defendant, Carol Belli, in one or more of the following respects, in that she:

- a. Operated said motor vehicle with conscious disregard for the safety of others, including the Plaintiff's decedent, by accelerating said motor vehicle at a high rate of speed and while under the influence of alcohol and/or drugs, through a heavily traveled crosswalk and directly into the path of the Plaintiff's decedent and other pedestrians crossing the roadway; and
- b. Consciously and with deliberate disregard for the safety of others, operated a motor vehicle in a reckless and dangerous manner without having due regard to the width, traffic, and use of the roadway, and at an excessive rate of speed given the circumstances then and there existing when she knew or should of

known the danger that it posed to others, including the Plaintiff's decedent, yet ignored such danger.

6. Said reckless conduct was a substantial factor in causing the collision and the Plaintiff decedent's injuries and damages which resulted therefrom.

7. As a result of the reckless conduct of the Defendant, Seth Wakeman sustained severe and permanent injuries to his body including a subscalpular and subgaleal hemorrhage, a right temporalis muscle hemorrhage, a cerebrum and cerebellum subarachnoid hemorrhage, a soft tissue hemorrhage of the torso, fractures of the right ribs and thoracic vertebrae, lung contusions, visceral lacerations, a left pulmonary edema, a hemoperitoneum, an avulsion pocket to the right lower extremity, fractures of the right tibia and fibula, a dislocated right humerus, and numerous abrasions to the extremities, torso, and head. Seth was transported by ambulance to Lawrence and Memorial Hospital where he underwent emergency medical treatment until he died on March 9, 2019. Seth suffered from multiple traumas and was required to undergo emergency medical care and treatment necessitated by said injuries all to his loss and damage.

8. As a result of the reckless conduct of the Defendant, the Plaintiff's decedent was required to spend various sums of money for medical care and treatment and diagnostic tests necessitated by said injuries all to his loss and damage.

9. As a result of the reckless conduct of the Defendant, Seth Wakeman suffered severe physical and mental pain, anguish and anxiety, as well as conscious pain and suffering and his untimely death.

10. As a result of the reckless conduct of the Defendant, the Plaintiff's decedent suffered the premature loss of the enjoyment of all of life's activities, including the enjoyment of his family and friends and his personal, recreational and social relationships and activities, all of which provided him with particular pleasure and happiness.

11. As a further result of the reckless conduct of the Defendant, his Estate incurred funeral, cremation, and burial expenses necessitated by Seth's death, all to its loss and damage.

**WHEREFORE**, the Plaintiffs claim:

1. Fair, just and reasonable money damages;
2. Punitive and exemplary damages; and
3. Attorneys' fees and costs.

THE PLAINTIFFS

By: 

Robert I. Reardon, Jr., Esq.

**THE REARDON LAW FIRM, P.C.**

Their Attorneys

RETURN DATE: OCTOBER 8, 2019

ESTATES OF JOANNA AND SETH  
WAKEMAN, BY THEODORE LADWIG,  
EXECUTOR

SUPERIOR COURT

V.

JUDICIAL DISTRICT OF  
NEW LONDON AT  
NEW LONDON

CSAA AFFINITY INSURANCE COMPANY  
D/B/A AAA INSURANCE COMPANY,  
LUCILLE J. KILEY, PERMITTEE OF  
CAPTAIN DANIEL PACKER INN A/K/A  
CAPTAIN DANIEL PACKER INN, LTD.,  
A/K/A CAPT. DANIEL PACKER INNE, LTD.,  
AND CAPTAIN DANIEL PACKER INN, LTD,  
A/K/A CAPT. DANIEL PACKER INNE, LTD.,  
A/K/A CAPTAIN DANIEL PACKER INN,  
BACKER OF LUCILLE J. KILEY D/B/A  
CAPTAIN DANIEL PACKER INN, AND  
CAROL BELLI

SEPTEMBER 5, 2019

**STATEMENT RE: AMOUNT IN DEMAND**

The amount, legal interest or property in demand is greater than Fifteen  
Thousand and No/100 (\$15,000.00) Dollars, exclusive of interest and costs.

THE PLAINTIFFS

By: 

Robert I. Reardon, Jr., Esq.

**THE REARDON LAW FIRM, P.C.**

Their Attorneys

## **EXHIBIT A**

**NOTICE UNDER DRAM SHOP ACT**

TO: LUCILLE J. KILEY, PERMITTEE  
CAPTAIN DANIEL PACKER INN  
32 WATER STREET  
MYSTIC, CT 06355

CAPTAIN DANIEL PACKER INN, LTD., BACKER  
LUCILLE J. KILEY  
32 WATER STREET  
MYSTIC, CT 06355

ERIC M. JANNEY, AGENT FOR SERVICE  
C/O BLOCK, JANNEY & PASCAL, LLC  
12 ROOSEVELT AVENUE  
MYSTIC, CT 06355

Notice is hereby given of intent to bring an action under § 30-102 of the Connecticut General Statutes entitled "Dram Shop Act: Liquor Seller Liable for Damage by Intoxicated Person."

Person to Whom Sale Was Made: Carol Belli

Name and Address of Injured Persons: Joanna and Seth Wakeman  
199 Montauk Avenue  
Stonington, CT 06378

Date and Time of Sale of Alcohol: Saturday, March 9, 2019 approximately between the hours of 5:30 p.m. and 8:00 p.m. Carol Belli was a patron of the Captain Daniel Packer Inn.

Date and Time of Accident: On Saturday, March 9, 2019 at approximately 8:00 p.m. Carol Belli was traveling on Route 27, aka Greenmanville Avenue in Mystic, Connecticut. She struck Joanna and Seth Wakeman while they were crossing the street in the vicinity of Latitudes Restaurant, 105 Greenmanville Avenue, causing them to sustain fatal injuries.

**THE REARDON LAW FIRM, P.C.**  
Attorneys at Law

160 Hempstead Street • P.O. Drawer 1430 • New London, CT 06320 • Tel. (860) 442-0444 • Juris No. 102515



Injuries:

Both Joanna and Seth Wakeman were killed  
as a result of this accident.

Dated at New London, Connecticut, this 22<sup>nd</sup> day of March 2019.

THE REARDON LAW FIRM, P.C.

By: 

John J. Nazzare, Esq.

THE REARDON LAW FIRM, P.C.  
Attorneys at Law

160 Hempstead Street • P.O. Drawer 1430 • New London, CT 06320 • Tel. (860) 442-0444 • Juris No. 102515

**RETURN OF SERVICE**

State of Connecticut)

SS: Mystic

March 28, 2019

County of New London)

Then and there by virtue hereof and by direction of the issuing attorney, I left a true and attested copy of the original Notice Under Dram Shop Act with and in the hands of, Eric M. Janney, Registered Agent for the within named Captain Daniel Packer Inn, at said 12 Roosevelt Avenue, Mystic, Connecticut.

The within and foregoing is the entire original process described above with my doings endorsed hereon.

Attest:

  
Courtland Hall  
State Marshal

**Fees:**

Service	\$ 40.00
Travel	\$ 11.60
Pages	\$ 2.00
End.	\$ 0.80

<b>Total</b>	<b>\$ 54.40</b>
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**NOTICE UNDER DRAM SHOP ACT**

TO: LUCILLE J. KILEY, PERMITTEE  
CAPTAIN DANIEL PACKER INN  
32 WATER STREET  
MYSTIC, CT 06355

CAPTAIN DANIEL PACKER INN, LTD., BACKER  
LUCILLE J. KILEY  
32 WATER STREET  
MYSTIC, CT 06355

ERIC M. JANNEY, AGENT FOR SERVICE  
C/O BLOCK, JANNEY & PASCAL, LLC  
12 ROOSEVELT AVENUE  
MYSTIC, CT 06355

Notice is hereby given of intent to bring an action under § 30-102 of the Connecticut General Statutes entitled "Dram Shop Act: Liquor Seller Liable for Damage by Intoxicated Person."

Person to Whom Sale Was Made:	Carol Belli
Name and Address of Injured Persons:	Joanna and Seth Wakeman 199 Montauk Avenue Stonington, CT 06378
Date and Time of Sale of Alcohol:	Saturday, March 9, 2019 approximately between the hours of 5:30 p.m. and 8:00 p.m. Carol Belli was a patron of the Captain Daniel Packer Inn.
Date and Time of Accident:	On Saturday, March 9, 2019 at approximately 8:00 p.m. Carol Belli was traveling on Route 27, aka Greenmanville Avenue in Mystic, Connecticut. She struck Joanna and Seth Wakeman while they were crossing the street in the vicinity of Latitudes Restaurant, 105 Greenmanville Avenue, causing them to sustain fatal injuries.

**THE REARDON LAW FIRM, P.C.**  
Attorneys at Law

160 Hempstead Street • P.O. Drawer 1430 • New London, CT 06320 • Tel. (860) 442-0444 • Juris No. 102515

Injuries:

Both Joanna and Seth Wakeman were killed  
as a result of this accident.

Dated at New London, Connecticut, this 22<sup>nd</sup> day of March 2019.

THE REARDON LAW FIRM, P.C.

By: 

John J. Nazzaro, Esq.

THE REARDON LAW FIRM, P.C.  
Attorneys at Law

160 Hempstead Street • P.O. Drawer 1430 • New London, CT 06320 • Tel. (860) 442-0444 • Juris No. 102515

**RETURN OF SERVICE**

State of Connecticut)

SS: Mystic

April 1, 2019

County of New London)

Then and there by virtue hereof and by direction of the issuing attorney, I left a true and attested copy of the original Notice Under Dram Shop Act with and in the hands of within named Lucille J. Kiley, Permittee, at said 32 Water Street, Mystic, Connecticut.

The within and foregoing is the entire original process described above with my doings endorsed hereon.

Attest:

  
Courtland Hall  
State Marshal

**Fees:**

Service	\$ 40.00
Travel	\$ 5.16
Pages	\$ 2.00
End.	\$ 0.80

Total	\$ 47.96
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**NOTICE UNDER DRAM SHOP ACT**

TO: LUCILLE J. KILEY, PERMITTEE  
CAPTAIN DANIEL PACKER INNE, LTD.  
32 WATER STREET  
MYSTIC, CT 06355

ERIC M. JANNEY, AGENT FOR SERVICE  
C/O BLOCK, JANNEY & PASCAL, LLC  
12 ROOSEVELT AVENUE  
MYSTIC, CT 06355

Notice is hereby given of intent to bring an action under § 30-102 of the Connecticut General Statutes entitled "Dram Shop Act: Liquor Seller Liable for Damage by Intoxicated Person."

Person to Whom Sale Was Made: Carol Belli

Name and Address of Injured Persons: Joanna and Seth Wakeman  
199 Montauk Avenue  
Stonington, CT 06378

Date and Time of Sale of Alcohol: Saturday, March 9, 2019 approximately between the hours of 5:30 p.m. and 8:00 p.m. Carol Belli was a patron of the Captain Daniel Packer Inn.

Date and Time of Accident: Saturday, March 9, 2019 approximately 8:00 p.m. Carol Belli was traveling North on Route 27, AKA Greenmanville Avenue in Mystic, Connecticut. She struck Joanna and Seth Wakeman while they were crossing the street in an easterly direction in the vicinity of Latitudes Restaurant 105 Greenmanville Avenue, causing them to sustain fatal injuries.

Injuries: Both Joanna and Seth Wakeman were killed as a result of this accident.

**THE REARDON LAW FIRM, P.C.**  
Attorneys at Law

160 Hempstead Street • P.O. Drawer 1430 • New London, CT 06320 • Tel. (860) 442-0444 • Juris No. 102515

Dated at New London, Connecticut, this 8<sup>th</sup> day of April 2019.

THE REARDON LAW FIRM, P.C.

By: 

John J. Nazzaro, Esq.

THE REARDON LAW FIRM, P.C.  
Attorneys at Law

160 Hempstead Street • P.O. Drawer 1430 • New London, CT 06320 • Tel. (860) 442-0444 • Juris No. 102515

**RETURN OF SERVICE**

State of Connecticut)

SS: Mystic

April 17, 2019

County of New London)

Then and there by virtue hereof and by direction of the issuing attorney, I left a true and attested copy of the original Notice Under Dram Shop Act with and in the hands of within named Lucille J. Kiley, Permittee, Captain Daniel Packer Inne, LTD. at said 32 Water Street, Mystic, Connecticut.

And afterward on April 18, 2019, I left a true and attested copy of the original Notice Under Dram Shop Act with and in the hands of, Eric M. Janney, Agent for Service, c/o Block, Janney & Pascal, LLC, at said 12 Roosevelt Avenue, Mystic, Connecticut.

The within and foregoing is the entire original process described above with my doings endorsed hereon.

Attest:

  
Courtland Hall  
State Marshal

Fees:

Service	\$ 80.00
Travel	\$ 20.65
Pages	\$ 4.00
End.	\$ 1.20

Total	\$ 105.85
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